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February 23, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080**

Dear Judge Martinotti:

In accordance with CMO #3, the parties submit the following weekly status report through the undersigned counsel:

1. The parties have provided final versions of the proposed Confidentiality Order and have agreed on a schedule to provide a joint submission to the Court by March 5, 2024.
2. Earlier today, Defendants provided their revisions to the version of the ESI Protocol circulated by Plaintiffs on February 5, 2024. The parties are conferring regarding a schedule to promptly bring disputed issues before the Court.
3. Plaintiffs are awaiting a response to their proposals regarding a process for Rule 12 briefing. The parties anticipate having a proposal for the Court prior to the March case management conference.

We thank the Court for its continued attention to this matter.

Hon. Brian R. Martinotti, U.S.D.J.

February 23, 2024

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Respectfully submitted,

/s/ James E. Cecchi

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*Liaison Counsel for*

*Third-Party Payer Class Track*

/s/ Joanne Cicala

Joanne Cicala

*Liaison Counsel for*

*The State Attorney General Track*

/s/ David R. Buchanan

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*Liaison Counsel for*

*Self-Funded Payer Track*

/s/ John D. Tortorella

John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)  
All Counsel of Record (via ECF)